

**Granby
Department**

Highway

250 State St.
Granby, Ma 01033
(413) 467-7575

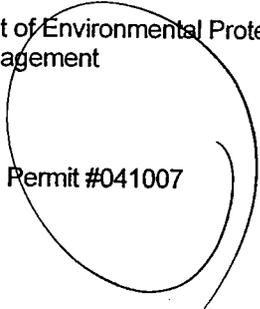


April 4, 2005

Massachusetts Department of Environmental Protection
Division of Watershed Management
627 Main Street
Worcester, MA 01608

Re: Annual Report NPDES Permit #041007

Attn: Mr. Glenn Haas

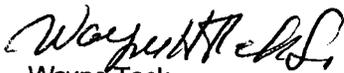


Dear Mr. Haas:

Enclosed is a report from the Town of Granby on the implementation of our stormwater management program.

If you have any further questions, please contact Chris Martin Administrative Assistant or David Desrosiers, Highway Superintendent.

Sincerely,


Wayne Tack
Selectman

Received
8-23-05
TUM

Self Assessment:

The Town of Granby continues to make significant progress towards compliance with the BMPs that are described in our notice of intent. We are mapping of our storm drainage system with our own staff. All of the catch basins have been located in the field with the GPS equipment and we are beginning to map the storm outfalls and piping systems.

We are hoping to purchase a plotter in the near future. This will enable us to create preliminary paper maps of the system. We would like to have these maps available to first responders and public safety officials by next year. We have also purchased ARCGIS software. We hope to incorporate all of the Stormwater data into a fully functional G.I.S. system. The GIS system will enable us to better manage the entire stormwater program.

We have already begun to realize many benefits from the mapping alone. We have found many catchbasins that were previously unknown or not documented. Obviously, these basins were not being maintained. Also, we have located one illicit discharge into our system. We have reported this discharge to the Board of Health. The Board of Health is taking action on this apparent failed septic system.

We have constructed a new DPW facility. The new facility will greatly improve our housekeeping operations.

We have been negotiating with the City of Chicopee to provide sanitary sewer service to a section of New Ludlow Road in Granby. Our consultant is finishing the design work. We hope to be able to bring this to Town meeting this year in order to appropriate funding for construction.

There is a definite increase in the overall awareness about stormwater runoff. Although some of the goals may be difficult to achieve, due to the budget cuts and staff reductions experienced recently in our town. We are continuing to work at fulfilling as many of the goals as time and funding will allow.

Appropriateness of BMPs:

As mentioned above the mapping has begun to yield many positive results. We believe that the map will be a very useful and important tool for the successful management of our system. It is essential to have an accurate map of the system before we can implement the IDDE portion of the program.

However, Based on our preliminary observations, we do not believe that illicit discharges are a significant problem in our system. We suspect that there may be a few illicit discharges but we believe that these are extremely rare and isolated occurrences.

In contrast, the erosion and sedimentation is a more extensive problem. We suspect that the most of the benefits will be achieved through erosion and sedimentation control portions of the program.

The Town of Granby has formed a stormwater Phase 2 committee. The committee is currently working on drafting proposed stormwater management by-laws. We are anxiously awaiting the by-laws so that progress can be made in these areas.

Progress Toward Achievable Goals:

Specific achievements toward the various BMPs are detailed below and grouped under the individual BMP I. D. number:

- 1) Storm Water phase 2 committee formed and working on proposed by laws for stormwater management program.
- 3) Troubled waters brochures and posters are available at Town Hall.
- 4) Administrative Assistant has begun upgrading the Town's computer system. The Board of Selectmen has asked the schools for help and they seem to be very interested in creating a website for the town.
- 8) The Board of Selectmen is looking for volunteers to appoint to the Conn. And Chicopee river watershed councils. No one has accepted the position to date.
- 9) Household waste recycling days are held annually.
- 10) The Boy scouts have not responded to the request for help with the catch basin stenciling. The Board of Selectmen has also asked the Schools to assist with this BMP. They are considering incorporating this with their earth day activities.
- 11) Same as BMP 10. We have also accepted community service volunteers that have been provided through the court system to pick up roadside trash and clean up at the parks.
- 12) The Highway Department has always provided assistance for community cleanups. Also, We promptly try to pick up all large items that are dumped along the roadsides. We try not to let any accumulation occur in order to discourage and mitigate future dumping.
- 13) The Highway Department has purchased a hand held GPS unit and located nearly all the Catch Basins. We are proceeding with the mapping of outfalls and stormdrain piping as time allows.
- 14) We are not aware of any funding available for mapping of our outfalls. Therefore, we are proceeding with this in house. We have purchased Arcgis software and are working on creating a full GIS system.
- 15) We are concentrating our efforts on mapping the system at the present time. Because of the limited plans and data that was available, we did not believe it was feasible to implement an effective IDDE program until we knew the extent and location of our system. While mapping the system, we have found one illicit discharge on Batchelor Street. The Board of Health has been notified and they are taking action on this apparent failed septic system. We will continue noting any suspicious connections as we map the system and during routine catch basin cleaning operations. We intend to expand the IDDE efforts in the future once more data is acquired.
- 16) The Board of Health is requiring the homeowner at the residence where the suspected illicit discharge was found to hire an engineer and repair the septic system. The board ordered this work to begin as soon as the weather permitted. We will continue to monitor this area over the next few months to ensure that the problem is corrected.
- 23) The Town has constructed a new DPW building. The new facility will allow improved maintenance and housekeeping. We have installed our new wastewater evaporator at the facility. We have purchased secondary containment pallets for all oils stored at our facility. We have been waiting until this move was completed before initiating the task of preparing a municipal operation plan. Now that this has been accomplished we will work on the plan as time allows.
- 24) See above
- 26) The Highway Department has reconstructed Kendall Street. We have utilized grassed swales along much of the roadway for stormwater detention / infiltration. Several deep sump basins were also added to reduce sediment transport. In addition, we have repaired several existing catch basins on High Street and New Ludlow Road.

Next Cycle:

As mentioned previously, the town has been forced to reduce staff and budgets due to financial constraints. Obviously, we suspect that it will be difficult to achieve all of our future goals under these circumstances unless outside sources of funding become available.

We will continue to make a good faith effort to keep the program on schedule with the resources that are available.

Next year, we hope to have preliminary paper maps of our storm water system available and ready use by first responders in the event of an oil or chemical spill. We are continuing to work on data collection and eventually hope to have all stormwater information available in a geodatabase format for use in a GIS system.

Proposed stormwater by-laws are being drafted. We hope to be able to bring these to Town meeting for a vote sometime during the next year.

DPW representatives are attending seminars and putting into practice good housekeeping and cleaning practices. Because the DPW Department is a very small Department, The whole crew quite readily becomes aware of what is expected of them. We will devote the time to creating the formal written policy as time allows in the future.

Changes:

Due to significant staff reductions and budget cuts at the Highway Department over the last few years, it may not be possible to send three employees annually to training seminars. We will make every attempt to send as many employees as possible to training; however, we suspect that only one or two employees will be able to attend seminars annually.

Reliance on Others:

The Stormwater Phase 2 committee is drafting proposed by-laws for a stormwater management program. In the past, any proposed by-law changes in town have been very contentious. Therefore, it has been difficult to obtain the votes required for passage. We are trying to draft the proposed stormwater by-laws in a manner that will mitigate opposition and yet provide adequate control and enforcement capability to ensure an effective program. As mentioned above, we believe that the erosion and sedimentation controls will yield significant benefits to our system. Therefore, the passage of these by laws will continue to be a high priority.

Many of our bmp's require volunteers and help from the community. Although, we have made significant progress over the last year, we have not received as much assistance as possible in these areas. For this reason, we have attempted to solicit help from other groups. We are working diligently to increase the awareness of the program and hopefully find new volunteers.

Program Summary:

See chart attached

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____
 EPA No. _____

Name: _____
 Date: _____

BMP ID.	BMP	Responsible Dept./Person	Status	Measurable Goal
Minimum Control Measure 1				
1	Create a Stormwater Program	Selectmen/DPW/Planning/Health	Committee Drafting By/laws	Present to public draft stormwater management plan
2	Create a Stormwater Program	Selectmen/DPW/Planning/Health	In Committee	Identify sources of assistance to implement plan
3	Address specific groups	DPW	Brochures available at town hall	Distribute EPA and other relevant educational brochures.
4	Target groups likely to impact stormwater	DPW	Awaiting By Law draft	Brochures targeting specific audiences and activities will be available. Present to public draft of Comprehensive Stormwater Management Plan
5	Identify alternate information	Administrative Assistant/DPW		Identify funding sources and apply for assistance to implement plan including education and outreach
6	Identify alternate information	Administrative Assistant/DPW		Public meeting notices and reviewing SMP
7	Utilize local public access channel	DPW	In process/ when appropriate	Town will appoint a liaison to Conn. And Chicopee river watershed councils
8	Develop, conduct and document educational programs	Liaison/DPW	Looking for Volunteers	Sponsor hazardous waste collection days
9	Promote household waste recycling	Board of Health/ DPW	On going annually	
Minimum Control Measure 2				
10	Storm drain stenciling	DPW	Talked to Schools	Develop a stencil program Boy scouts have not responded schools may be interested in assisting
11	Community clean ups	Conservation commission/DPW	Talked to Schools	Encourage stream team cleanups
12	Community clean ups	DPW	Always available on request	Provide trucks and support efforts
Minimum Control Measure 3				
13	Inventory and Mapping storm drain system	DPW	Proceeding in -house	Identify funding and obtain assistance
14	Mapping and identification of outfalls and receiving waters	DPW/Assessors	Proceeding in -house	Develop and implement a plan to map outfalls to receiving waters
15	Identification/description of problem areas	DPW	Awaiting mapping, we have located 1 illicit discharge while mapping	Develop and implement an IDDE plan
16	Enforcement procedures addressing illicit	Planning/Building/Town	Board of Health has	Review whether local authority is appropriate and able to respond to

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____
 EPA No. _____

Name: _____
 Date: _____

	discharges	Council/Board of health	responded	illicit discharges.
17	Public information program regarding hazardous waste and dumping	Board of Health/DPW		Provide educational brochures to residents promoting proper disposal of household hazardous wastes and conditions for regional collections.
18	Initiation of recycling programs	Board of Health/DPW		Apply for funding assistance in public education and recycling materials
19	Watershed assessments and studies	Board of Health/DPW/Conservation		Identify opportunities for assistance to support watershed assessment and implementation activities.
20	Watershed assessments and studies	Board of Health/DPW/Conservation		Encourage cooperation with public drinking water suppliers to develop wellhead protection plans
Minimum Control Measure 4				
21	Bylaw: Storm water management regulations for construction sites 1 acre or larger	Planning/Conservation/Town Council/Board of health/ZBA	Committee drafting bylaws	Review model by law
Minimum Control Measure 5				
22	Bylaw: Require post-construction runoff controls	Planning/Conservation/Town Council/Board of health/ZBA DPW	Committee Drafting bylaws	Review model by law
Minimum Control Measure 6				
23	Develop a municipal operations and Maintenance Plan	DPW	Proceeding as funding allows	Develop and update an operations plan
24	Develop a municipal operations and Maintenance Plan	DPW	Proceeding as funding allows	Implement a formal inspection program
25	Develop and implement training programs for municipal employees	DPW	Ongoing	Send employees for training seminars

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____
EPA No. _____

Name: _____
Date: _____

26	Review Storm drain infrastructure	DPW	On going	Review infrastructure in chapter 90 utilization
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 11, 2005

Mr. David Desrosiers
Superintendent of Highways
250 State St
Granby, MA 01033

RE: Non-Submittal of Annual Report

Dear Mr. Desrosiers:

EPA has not received an Annual Report from your municipality as required by the Small Municipal Separate Storm Sewer System General Permit. This report was due on May 1, 2005, to both EPA and the Massachusetts Department of Environmental Protection.

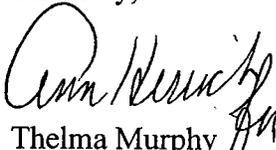
EPA has developed a sample format for an Annual Report which you may find helpful. This information is available at <http://www.epa.gov/ne/npdes/stormwater/ms4-annual-rpt.html>.

You are strongly urged to submit your annual report as soon as possible. Failure by the municipality to submit this report is a violation of both the General Permit and the Clean Water Act and may result in an enforcement action by EPA pursuant to Section 309 of the Clean Water Act, 33 U.S.C. §1319. This statute permits EPA to seek the imposition of penalties.

If you have any questions, please contact me at 617-918-1615.

Sincerely,

617-918-1560 (Ann Herich)


Thelma Murphy
Stormwater Coordinator

cc: MADEP